

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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FCC - MAILROOM

**In the matter of
Amendment of 73.202
Table of Allotments
FM Broadcast Stations**

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To: John A. Karousos
Assistant Chief, Audio Division
Office of Broadcast License Policy
Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Dr. Sandra L. Woodruff (petitioner) respectfully petitions the FCC to institute a rule making proceeding to amend the FM Table of Allotments to add Channel 229C3 at Tenino, Washington.

DISCUSSION

Petitioner respectfully submits that the public interest and convenience would be served by allocating Channel 229C3 to Tenino, Washington as the community's first local radio service.

Tenino, Washington is a city incorporated by the state of Washington, with a population of 1447 people, according to census figures for the year 2000 provided by the U.S. Census Bureau.

Tenino has its own post office and a ZIP code of 98589. Tenino is the default city for this ZIP code, and is the only city listed for this ZIP code at the USPS.com website.

There is an active business community. In 2003, the State of Washington reports \$13,652,732 in taxable retail sales in the City of Tenino.

Tenino is governed by a five member city council under an elected mayor. City Council meets twice monthly.

The Tenino Fire Department was established in 1906. Over the years, it merged with nearby fire protection units to form Thurston County Fire District 12, based in Tenino.

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The Tenino/Bucoda Police Department operates from municipal facilities in Tenino and serves Tenino as well as its smaller neighbor, Bucoda. The Tenino Municipal Court adjudicates all municipal civil and criminal violations for Tenino as well as the nearby City of Rainier, and the Town of Bucoda. The Court consists of a part time Judge, Court Administrator, and two Court Clerks

Tenino's Public Works Department provides domestic water supply and distribution, storm water control, streets, and engineering.

Tenino operates a city library and is part of the Timberland Regional Library system. Cultural activities also include the Tenino Depot Museum in the city's former Northern Pacific railroad station.

Tenino School District 402 provides a complete educational program from pre-kindergarten through Grade 12. There are 1413 students enrolled in the district's four schools, a high school, a middle school and two elementary schools.

Active churches include the Tenino Church of God, three Baptist churches, St. Peter's Parish, Offut Lake Community Church, First United Methodist Church and First Presbyterian Church.

Due to a distance separation conflict with KUBE Channel 227C in Seattle, a transmitter site restriction of 2.25km west of Tenino City Center is requested at:

46:51:22 N

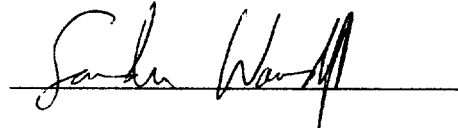
122:52:30 W

Exhibit 1 is an engineering study showing that channel 229C3 could be allocated to Tenino, Washington, consistent with the FCC's FM separation rules in Part 73.207. Please note that KPDQ 229C in Portland has a construction permit for 230C1 and will cause no interference when construction is complete there. A condition that the KPDQ 230C1 facility be operational before the instant application is allowed to begin program tests would be acceptable to the petitioner.

Should the commission grant this petition, the petitioner will apply for the channel and construct a new facility in a timely manner if successful in gaining the construction permit.

I certify that the factual information provided in this Petition for Rule Making is correct and true to the best of my knowledge.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Sandra Woodruff", is written over a horizontal line.

Dr. Sandra L. Woodruff
2708 Hampton Ct. SE
Olympia, WA 98501

December 10, 2004

Exhibit 1 - Tenino 229C3 73.207 Separation

Dr. Sandra Woodruff - Engineering Consultant.

Job: WA Tenino 229C3.fmj

Master Database: 2004_Nov_18.fmd

Lat: N46:51:22 Lon: W122:52:30 NAD-27

Scale: 1:200000

Channel: 229 Class: C3

Status: Licensed, Construction Permit, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 58 km, Clearance: -0.5km

Comments: No Comments

Description: Proposed site for new FM allocation 229C3 at Tenino, Washington with site restriction
2.25 km west of city center

rfInvestigator-FM Version 2.1.15

by rfSoftware, Inc.

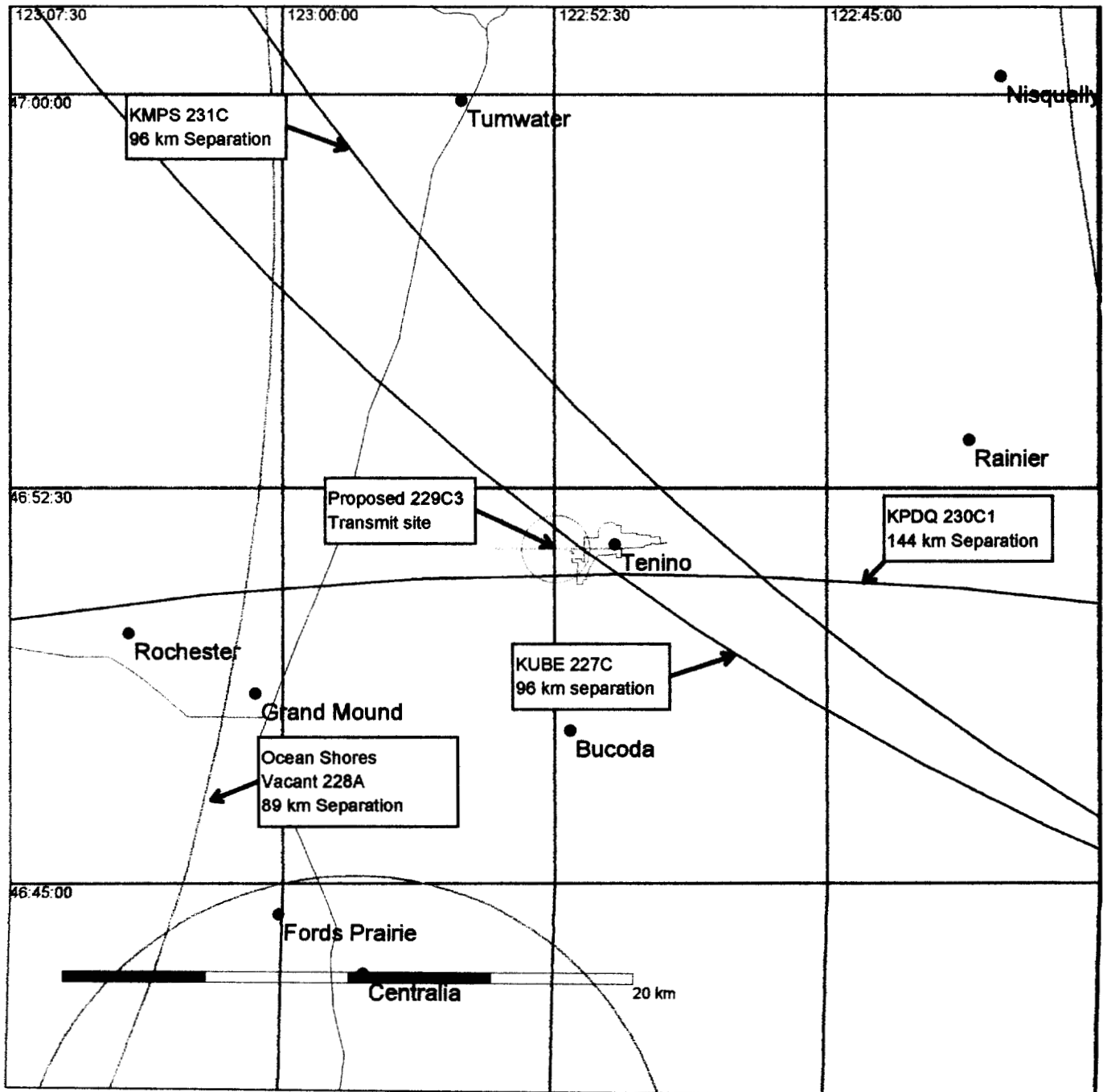
Date: 11/29/2004 1:59:12 AM

Key:

Short

Close

Clear



Dr. Sandra Woodruff - Engineering Consultant - EXHIBIT 2 - TENINO WA 229C3 - 73.207 Distance Analysis

Job: WA Tenino 229C3.fmj

Master Database: 2004_Nov_18.fmd

Lat: N46:51:22 Lon: W122:52:30 NAD-27

Channel: 229 Class: C3

Status: Licensed, Construction Permit, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 25 km

Comments: No Comments

Description: City Grade 70 dBu predicted coverage for 229C3 Tenino, WA

Page 1 of 1

Date: 11/29/2004 3:29:32 AM

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Callsign	City	State	Channel	Adjacency	ERP	HAAT	Class	Intl	Status	Bear	Latitude (N)	Longitude (W)	Distance	73.207 Min	73.207 Clear
KPDQ-FM	PORTLAND	OR	229 : 93.7 MHz	Co-Chan	97.00	387	C	C	LIC	175	N45:29:20	W122:41:40	152.62	237	-84.38
KUBE	SEATTLE	WA	227 : 93.3 MHz	2nd Adj	98.00	387	C		LIC	037	N47:32:40	W122:06:26	96.11	96	0.11
KPDQ-FM	PORTLAND	OR	230 : 93.9 MHz	1st Adj	0.00	0	C1		RSV	179	N45:33:25	W122:50:42	144.43	144	0.43
KPDQ-FM	PORTLAND	OR	230 : 93.9 MHz	1st Adj	0.00	0	C1		RSV	179	N45:33:25	W122:50:42	144.43	144	0.43
KMPS-FM	SEATTLE	WA	231 : 94.1 MHz	2nd Adj	69.00	698	C		LIC	044	N47:30:17	W121:58:04	99.63	96	3.63
STAT:VAC	OCEAN SHORES	WA	228 : 93.5 MHz	1st Adj	0.00	0	A	A	VAC	277	N46:57:47	W124:09:50	98.92	89	9.92
STAT:VAC	CHEHALIS	WA	282 : 104.3 MHz	IF	0.00	0	A		VAC	197	N46:38:57	W122:57:58	24.05	12	12.05
CJJRFM	VANCOUVER	BC	229 : 93.7 MHz	Co-Chan	75.00	686	C	C		359	N49:21:29	W122:57:09	278.25	259	19.25
KXAA	CLE ELUM	WA	229 : 93.7 MHz	Co-Chan	6.00	29	A		LIC	078	N47:09:06	W120:47:23	161.96	142	19.96

Exhibit 3 - Tenino 229C3 - 70 dBu

Dr. Sandra Woodruff - Engineering Consultant

Job: Turnwater NCE Set Aside.fmj

Master Database: 2004_Nov_18.fmd

Lat: N46:51:22 Lon: W122:52:30 NAD-27

Scale: 1:500000

Channel: 229 Class: C3

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 5 km, Clearance: -0.5km

Comments: No Comments

Description: City Grade 70 dBu predicted coverage for 229C3 Tenino, WA

rfInvestigator-FM Version 2.1.15

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Date: 12/5/2004 3:49:41 PM

Key:

City Grade

Protected

Co-Channel

1st Adj

2nd/3rd Adj

